

Georgia Department of Natural Resources

Environmental Protection Division • Air Protection Branch

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Richard E. Dunn, Director

June 21, 2016

Beverly A. Spagg
Chief, Air & EPCRA Enforcement Branch
EPA Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30305

Re: Request for Applicability Determination under 40 CFR Part 60, Subpart AAAA for Small
Municipal Waste Combustion Units
Synergy Solutions Crisp County, LP

Dear Ms. Spagg:

Georgia EPD seeks a New Source Performance Standard applicability determination from EPA Region 4 regarding the proposed facility Synergy Solutions Crisp County, LP. to be located in Cordele, Crisp County, Georgia. A copy of their air quality application submitted to the Division is attached.

The proposed facility would accept MSW at a rate of up to 360 tons per day, process the MSW through a "fiberizer" to remove the biomass, and sort the remaining solid waste on site to remove metals and other non-organics. The biomass would be gasified at a rate of 120 tons per day in a low-oxygen cross flow unit where the organics are transformed to biochar and syngas. Startup heat would come from two 2 MMBtu per hour direct fired LPG burners inside the unit. The syngas would be combusted in an adjacent chamber to produce heat. Fifty percent of the heat would be returned to the process and the remaining 50% would be sent to a waste heat boiler or vented out a stack. Note that the syngas would not be filtered, processed, or cleaned prior to combustion.

The Division seeks a determination on if 40 CFR 60 Subpart AAAA for Small Municipal Waste Combustion Units applies to this process as proposed. Based on a search of EPA's ADI, the two EPA determinations most closely related are No. 1500025 dated 8/31/2010 and No. 1000019 dated 03/30/2010.

Please contact me at (404) 363-7143 or via e-mail at james.eason@dnr.ga.gov if you have any question or need additional information regarding this project. Georgia EPD appreciates your assistance in this matter.

Sincerely,



James A. Eason

Unit Manager, NOx Permitting Unit
Stationary Source Permitting Program

cc: Wesley Dunn